

THE HONORABLE MARCIA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

HUONG HOANG, an individual

Plaintiff,

v.

AMAZON.COM, INC., a Delaware
corporation, and IMDB.COM, INC., a
Delaware corporation,

Defendants.

No. 2:11-CV- 01709-MJP

**DECLARATION OF ASHLEY A.
LOCKE IN SUPPORT OF IMDB.COM,
INC.'S MOTION TO SEAL**

I, Ashley A. Locke, hereby declare as follows:

1. I am an associate with Perkins Coie LLP. I am one of the attorneys representing defendants Amazon.com, Inc. and IMDb.com, Inc. (collectively, "Defendants") in the above-referenced matter. I make this declaration based on personal knowledge and review of records and correspondence relating to the above-referenced matter.

2. I have conferred with Keith Scully, counsel for Plaintiff Huong Hoang ("Hoang") twice regarding the designation of certain documents as "Confidential" or "Highly Confidential—Attorneys' Eyes Only" under the Stipulated Protective Order, Dkt. No. 58. First, on October 1, 2012, we discussed by telephone the parties' respective confidentiality designations. Second, on December 3, we met in person and discussed the confidentiality

DECLARATION OF ASHLEY A. LOCKE IN
SUPPORT OF IMDB.COM, INC.'S MOTION TO
SEAL (No. CV- 01709-MJP) – 1

24976-0480/LEGAL25350641.1

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

1 designations of documents and testimony that the parties had submitted or intended to submit to
2 the Court in support of their motions for summary judgment.
3

4
5 3. As a result of those conferences, Defendants withdrew their designations on all
6 but three categories of documents. Attached hereto as Exhibit A is a true and correct copy of a
7 letter, dated December 4, 2012, from me to Keith Scully, counsel for Hoang, that addresses those
8 withdrawals.
9
10

11
12 4. Attached hereto as Exhibit B is a true and correct copy of a letter, dated
13 December 5, 2012, from Charlotte Williams, counsel for Hoang, to me that notified Defendants
14 that Hoang intended to file with this Court certain documents and deposition testimony
15 designated as confidential.
16
17

18
19 5. Attached hereto as Exhibit C is a true and correct copy of a letter, dated
20 December 7, 2012, from me to Charlotte Williams.
21

22
23 6. Attached hereto as Exhibit D is a true and correct copy of an email, dated
24 December 10, 2012, from Charlotte Williams to me.
25
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30
31 I declare under penalty of perjury under the laws of the United States that the foregoing is
32 true and correct.
33

34
35 DATED: December 10, 2012

36 By: /s/ Ashley A. Locke
37 Ashley A. Locke
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CERTIFICATE OF SERVICE

I certify that on December 10, 2012, I electronically filed the foregoing DECLARATION OF ASHLEY LOCKE with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record

Derek Alan Newman
Keith Scully
Charlotte Williams
 Newman Du Wors LLP
 1201 Third Avenue, Ste 1600
 Seattle, WA 98101

____ Via hand delivery
 ____ Via U.S. Mail, 1st Class, Postage Prepaid
 ____ Via Overnight Delivery
 ____ Via Facsimile
 ____ Via Email
X Via ECF _____

I certify under penalty of perjury that the foregoing is true and correct.

DATED this 10th day of December, 2012.

s/ Ashley A. Locke
 Charles C. Sipos, WSBA No. 32825
 Breena M. Roos, WSBA No. 34501
 Ashley Locke, WSBA No. 40521
Perkins Coie LLP
 1201 Third Avenue, Suite 4800
 Seattle, WA 98101-3099
 Telephone: 206.359.8000
 Facsimile: 206.359.9000
 E-mail: csipos@perkinscoie.com
 E-mail: broos@perkinscoie.com
 E-mail: alocke@perkinscoie.com
 Attorneys for Defendants Amazon.com, Inc.
 and IMDb.com, Inc.

EXHIBIT A



1201 Third Avenue, Suite 4900
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PHONE: 206.359.8000
FAX: 206.359.9000
www.perkinscoie.com

Ashley A. Locke
PHONE: (206) 359-8063
FAX: (206) 359-9063
EMAIL: A.Locke@perkinscoie.com

December 4, 2012

VIA EMAIL

Keith Scully
Derek Newman
Charlotte Williams
Newman Du Wors LLC
1201 Third Avenue
Suite 1600
Seattle, WA 98101
keith@newmanlaw.com
DN@newmanlaw.com
charlotte@newmanlaw.com

Re: Hoang v. Amazon.com, Inc., et al. / Confidentiality Designations Waiver

Dear Keith:

Thanks for meeting with Breena and me yesterday regarding your proposal to de-designate a significant amount of material currently designated as Confidential or Highly Confidential—Attorneys' Eyes Only.

Unfortunately, we are not in a position to agree to a full-scale waiver of all confidentiality designations. Since our meeting, however, Defendants have reviewed their previous confidentiality designations, and hereby withdraw the Confidential or Highly Confidential – Attorneys' Eyes Only designations of the following documents:

- Hoang's Amazon.com account order histories, Amazon 000099-112;
- IMDb.com Help Desk correspondence and other communications, IMDb 000947, 000960-63, 001031-32, 001034, 001037, 001041, 001091-92;
- Hoang's IMDb.com submission history, IMDb 001105-002565; and

LEGAL25290609.1

Keith Scully
December 4, 2012
Page 2

- IMDb.com's answer to Interrogatory No. 2 in IMDb.com Inc's Second Supplemental Answers and Objections to Plaintiff's First Interrogatories.

For the reasons discussed below, Defendants will not agree to withdraw their confidentiality designations on the remaining documents that they have designated, which fall into three general categories:

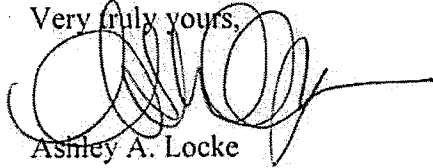
- **IMDb's IPS and other corporate information, IMDb 001087-1090, IMDb 002567-73, Amazon 000113-16, IMDb's answers to Interrogatory Nos. 4 and 11 in IMDb.com Inc's Second Supplemental Answers and Objections to Plaintiff's First Interrogatories.** As we discussed during our meeting, these documents contain certain information that could allow someone to compromise the security of IMDb's internal systems. However, to minimize the necessity of filing documents under seal, Defendants will provide redacted versions of these documents that may be publicly filed with the Court, without waiving the confidentiality designations of such documents. Per Section F(1)(b) of the Protective Order, please give us five days notice if you plan to file any of these documents with the Court, and we will provide a redacted copy prior to your filing.
- **Privateeye.com search logs, IMDb 001103-04.** These documents contain information regarding third parties, the identity of whom is irrelevant to this lawsuit. To minimize the necessity of filing documents under seal, please find attached a redacted version of this document (Bates IMDb 1042-43), which Defendants agree may be filed publicly with the Court. However, Defendants do not waive the Highly Confidential – Attorneys' Eyes Only designation of the underlying document, however. Thus, if you intend to file the non-redacted version, please give us five days notice if you plan to file any of these documents with the Court so that we may file a motion to seal.
- **IMDb's financial earnings, answer to Interrogatory No. 15 in IMDb.com Inc's Second Supplemental Answers and Objections to Plaintiff's First Interrogatories.** IMDb's financial earnings are not a matter of public record and are not at issue in this lawsuit. Per the Protective Order, please give us five days notice if you plan to file this interrogatory response with the Court.

If we have inadvertently neglected to mention any document designated by Defendants as confidential in the above, please let us know. Defendants explicitly maintain any confidentiality designation not specifically waived above.

Keith Scully
December 4, 2012
Page 3

Please let me know if you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Ashley A. Locke', with a long horizontal line extending to the right.

Ashley A. Locke

Enclosure

LEGAL25290609.1

People Search Background Checks Public Records Find People | Or...

http://secure.privateeye.com/Acc_Records.asp[Log Out](#) | [Account Info](#) | [My Reports](#) | [Search](#) | [Help](#)

Billions of Records at Your Fingertips

Welcome: Glancarlo Calrella

Membership: [Click here to renew your membership!](#)[Account Information](#)[Credit Card Activity](#)[Background Checks](#)[Other Reports](#)**Order Summary**

| Report Name | Number of Reports | Cost of Reports |
|--|-------------------|-----------------|
| <u>Business Reports</u> | 0 | \$0.00 |
| <u>Investigator Assisted Background Report</u> | 0 | \$0.00 |
| <u>Investigator Assisted Background Report with Criminal</u> | 0 | \$0.00 |
| <u>Previously Ordered Records</u> | 24 | \$119.80 |
| <u>Previously Ordered Searches</u> | 0 | \$0.00 |
| Totals: | 24 | \$119.80 |

Business Reports

No reports have been ordered.

Investigator Assisted Background Report

No reports have been ordered.

Investigator Assisted Background Report with Criminal

No reports have been ordered.

Previously Ordered Records

| | | | | |
|------------------------|-----------------------|--------|----------------------|---|
| 1. | 03/30/2009 | \$2.95 | People Records (2) | |
| | MALEKYONAN, ROSEMARIE | | | |
| 2. | 03/30/2009 | \$2.95 | People Records (1) | M. [REDACTED] M. [REDACTED] |
| 3. | 12/12/2008 | \$2.95 | People Records (9) | Z. [REDACTED] D. [REDACTED] |
| 4. | 11/14/2008 | \$2.95 | People Records (100) | M. [REDACTED] J. [REDACTED] |
| 5. | 11/12/2008 | \$2.95 | People Records (13) | HOANG, JUNE |
| 6. | 11/12/2008 | \$2.95 | People Records (15) | HOANG, HUONG THU |
| 7. | 11/07/2008 | \$2.95 | People Records (64) | N. [REDACTED] S. [REDACTED] |
| 8. | 11/06/2008 | \$2.95 | People Records (4) | E. [REDACTED] D. [REDACTED] |
| 9. | 11/05/2008 | \$2.95 | People Records (3) | S. [REDACTED] C. [REDACTED] |
| 10. | 11/04/2008 | \$2.95 | People Records (1) | B. [REDACTED] M. [REDACTED] S. |
| 11. | 11/04/2008 | \$2.95 | People Records (1) | S. [REDACTED] J. [REDACTED] A. |
| 12. | 11/04/2008 | \$2.95 | People Records (11) | S. [REDACTED] J. [REDACTED] A. |
| 13. | 10/29/2008 | \$2.95 | People Records (7) | W. [REDACTED] D. [REDACTED] |
| 14. | 10/27/2008 | \$2.95 | People Records (2) | B. [REDACTED] L. [REDACTED] |
| 15. | 10/20/2008 | \$2.95 | People Records (2) | K. [REDACTED] T. [REDACTED] |
| 16. | 09/19/2008 | \$2.95 | People Records (3) | N. [REDACTED] M. [REDACTED] A. |
| 17. | 09/04/2008 | \$9.95 | People Records (75) | F. [REDACTED] M. [REDACTED] |
| 18. | 08/25/2008 | \$2.95 | People Records (6) | R. [REDACTED] D. [REDACTED] In NJ |
| 19. | 07/29/2008 | \$9.95 | People Records (2) | C. [REDACTED] S. [REDACTED] E. In NY born [REDACTED] 1961 |
| 20. | 07/28/2008 | \$9.95 | People Records (18) | C. [REDACTED] D. [REDACTED] In NY |
| 21. | 07/22/2008 | \$9.95 | People Records (8) | B. [REDACTED] B. [REDACTED] |
| 22. | 07/18/2008 | \$9.95 | People Records (2) | V. [REDACTED] J. [REDACTED] |
| 23. | 03/19/2008 | \$9.95 | People Records (1) | B. [REDACTED] S. [REDACTED] In CA |
| 24. | 01/09/2008 | \$9.95 | People Records (4) | S. [REDACTED] D. [REDACTED] |
| Total: \$119.80 | | | | |

Previously Ordered Searches

No searches have been ordered.

[People Search](#) [Background Checks](#) [Public Records](#) [Find People | Or...](#)

http://secure.privateeye.com/Acc_Records.asp

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Advertisement

EXHIBIT B



December 5, 2012

SENT VIA EMAIL ONLY

Ashley Locke
Breena Roos
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Email: ALocke@perkinscoie.com
Email: BRoos@perkinscoie.com

**Re: Notice of Intent to file documents designated as "Confidential" in
*Hoang v. Amazon.com, Inc. et al.***

Dear Ashley and Breena:

Pursuant to Section F of the Protective Order (Dkt. 58), I write to notify you of Ms. Hoang's intent to file documents containing information designated "Confidential" or "Attorneys' Eyes Only" in connection with her motion for summary judgment.

The following is a list of documents previously designated by one of the parties, which will be filed with the motion:

- Hoang 000113-19 (Ex. 6 to Cairella 8/1/2012 Deposition)
- IMDb 001035-36
- IMDb 001044-52
- IMDb 001046-48
- IMDb 001050-51
- IMDb 001053-86
- IMDb 001987-90 (Ex. 7 to Cairella 8/1/2012 Deposition)
- IMBd 001103-04 (Ex. 6 to Cairella 30(b)(6) 8/2/2012 Deposition)
- IMDb.com, Inc.'s Answers and Objections to Plaintiff Huang's First Set of Interrogatories to Defendants IMDb.com, Inc. served on April 30, 2012 (specifically, answer to Interrogatory Nos. 6 and 8)

Additionally, Ms. Hoang intends to file the following portions of deposition transcripts, which have been designated pursuant to the Protective Order:

Pages from Deposition Transcript of Huong Hoang—July 26, 2012

- 84
- 118

Ashley Locke
Breena Roos
December 5, 2012
Page 2 of 2

- 122-125
- 134-141
- 158-159
- 162-163
- 213-214
- 216-218
- 221-222
- 255
- 301

Pages from Deposition Transcript of Huong Hoang—August 7, 2012

- 464-465
- 507
- 511-512

Pages from Deposition Transcript of Joe Kolkowitz—August 7, 2012

- 47

The parties have engaged in multiple conferences regarding the confidentiality designations in this case, including a meeting this Monday, December 3. Unfortunately, the parties have been unable to reach agreement regarding the validity of designations. While we believe we have satisfied the requirements of Section F(a) of the Protective Order, if you would like to continue these discussions, please contact Keith or me to set up a meeting.

Finally, if your clients intend to file a motion to seal under Local Rule 5(g), we would appreciate your professional courtesy of filing that motion by 3 p.m. on Monday, December 10, 2012. This will ensure our ability to comply with Local Rule 5(g)(5).

Please let me know if you have any questions.

Very truly yours,

Newman Du Wors LLP

Charlotte Williams

EXHIBIT C



1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
PHONE: 206.359.8000
FAX: 206.359.9000
www.perkinscoie.com

Ashley A. Locke
PHONE: (206) 359-8063
FAX: (206) 359-9063
EMAIL: A.Locke@perkinscoie.com

December 7, 2012

VIA EMAIL

Keith Scully
Charlotte Williams
Newman DuWors
1201 3rd Avenue, Ste. 1600
Seattle, WA 98101
keith@newmanlaw.com
charlotte@newmanlaw.com

Re: Hoang v. Amazon.com, Inc., et al. / Response to Notice of Intent

Charlotte:

Thank you for your letter dated December 5. You identify several documents and deposition testimony that neither IMDb.com, Inc. nor Amazon.com, Inc. ("Defendants") designated as confidential, as well as documents that neither Defendants nor Ms. Hoang designated as confidential. If Ms. Hoang prefers such documents be filed under seal, it is your obligation to file a motion to seal. *See* Dkt. No. 58, § F.

You will note that my December 4 correspondence identifies the documents that Defendants designated. Per that letter, the only documents listed in your December 5 letter that remain designated by Defendants are the following:¹

- **IMDb 001089-90.**² This document contains information that may allow IMDb's database security to be compromised. In lieu of filing this document, IMDb is willing to stipulate that certain IMDb employees accessed the IPS database on particular dates.

¹ You also provided notice of filing document IMDb 001086. Defendants designated this page Confidential, but hereby waive confidentiality.

² Please note that your letter identified this document as "IMDb 001987-90," which we presume is a typo.

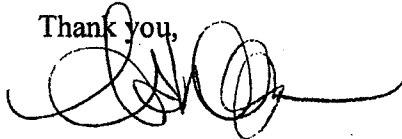
Keith Scully
December 7, 2012
Page 2

Please let us know what portion of this document you are intending to use and we will draft a stipulation accordingly.

- o **IMDb 001103-04.** In my December 4 letter, we provided you a redacted version of this document (IMDb 001042-43). For your convenience, please find an additional copy attached, which Defendants agree may be filed publicly.
- o **Hoang 000113-16.** Please note CR 5.2 requires redaction of the credit card number from this document prior to filing. Further, this document contains the personal address of a non-party and username and password of the account. Finally, we it contains information regarding third parties, the identity of whom is irrelevant to this lawsuit. To minimize the necessity of filing documents under seal, attached is a redacted version of this document, which Defendants agree may be filed publicly.

Under the newly adopted local rules regarding sealing, the Court has strongly indicated its preference for "agree[ing] to redact the document[s] so that sealing is unnecessary," particularly information "that the court does not need to consider." LCR 5(g)(1). If, despite this Court rule, you still intend to use the full, non-redacted versions of any of the above documents, Defendants will move to seal them. To meet your request that Defendants file their motion to seal by 3:00 p.m. on Monday, December 10, please let us know whether you will file the redacted versions of the documents no later than 10:00 a.m. on Monday.

Thank you,

A handwritten signature in black ink, appearing to read 'Ashley A. Locke', with a stylized, flowing script.

Ashley A. Locke

16

**Account Information:****Giancarlo Cairella**

Phone: [REDACTED]

Email: vertigo2712@yahoo.com

Customer Information**Account Information**

PURPOSE N/A

FIRST NAME Giancarlo *

MIDDLE NAME

LAST NAME Cairella *

ADDRESS [REDACTED] *

APARTMENT

City Seattle

STATE Washington *

ZIP CODE [REDACTED] *

PHONE NUMBER [REDACTED]

EMAIL ADDRESS vertigo2712@yahoo.com

☒ Okay to email this customer☒ Okay to call this customer

Update

Charge Summary

Login Info

REDACTED

**Giancarlo Cairella**

Phone: [REDACTED]

Email: vertigo2712@yahoo.com

Customer Information**Account Information**USERNAME vertigo2712 *PASSWORD [REDACTED] *STATUS Reviewed - General ▼ACCOUNT ACTIVATION Active ▼USER ID [REDACTED]PAID ACCOUNT YesCREDIT CARD NUMBER [REDACTED]CREDIT CARD TYPEEXPIRATION DATE [REDACTED] ▼DATE ADDED 1/9/2008 12:31:36 PM☐ Auto Renew**SERVICES**ADD SERVICE Select a Service ▼

Add Service

EXISTING SERVICE Monthly Membership \$49.95EXPIRATION : 5/31/2012 3:30:54 PM

Expire Date

MAX DAILY CHARGE\$ 250.00Select an Extend Option ▼

Extend Service

Process Fraud

Disable All Memberships

17

REDACTED

Credit Card History:

1 - 29 of 29 records

| Row | Date | Card No. | CC Exp. Date | Original Bill Paid | Amount | Status | Score | Product | Content |
|-----|-----------------------|------------|--------------|--------------------|---------|---------|-------|---------------------------------|---|
| 1 | 5/1/2012 3:30:54 PM | [REDACTED] | 2503594 | | \$49.95 | Success | 11.00 | Membership - Monthly Membership | |
| 2 | 5/1/2012 3:30:04 PM | [REDACTED] | 2503593 | | \$49.95 | Failure | | Membership - Monthly Membership | |
| 3 | 3/6/2012 2:21:55 PM | [REDACTED] | 2501795 | | \$49.95 | Success | 11.00 | Membership - Monthly Membership | |
| 4 | 10/18/2011 2:10:54 PM | [REDACTED] | 2497641 | | \$49.95 | Success | 11.00 | Membership - Monthly Membership | |
| 5 | 3/30/2009 1:31:18 PM | [REDACTED] | 2094473 | | \$2.95 | Success | 2.50 | Records - People | m [REDACTED], m [REDACTED] |
| 6 | 3/30/2009 12:16:10 PM | [REDACTED] | 2094304 | | \$2.95 | Success | 2.50 | Records - People | m [REDACTED], r [REDACTED] |
| 7 | 12/12/2008 9:11:41 AM | [REDACTED] | 1922937 | | \$2.95 | Success | 2.50 | Records - People | z [REDACTED], d [REDACTED] |
| 8 | 11/14/2008 3:35:01 PM | [REDACTED] | 1875476 | | \$2.95 | Success | 2.50 | Records - People | m [REDACTED], j [REDACTED] |
| 9 | 11/12/2008 1:33:48 PM | [REDACTED] | 1871523 | | \$2.95 | Success | 2.50 | Records - People | hoang, huong thu |
| 10 | 11/12/2008 1:29:07 PM | [REDACTED] | 1871513 | | \$2.95 | Success | 2.50 | Records - People | hoang, june |
| 11 | 11/7/2008 1:16:38 PM | [REDACTED] | 1862145 | | \$2.95 | Success | 2.50 | Records - People | n [REDACTED], s [REDACTED] |
| 12 | 11/6/2008 8:49:15 AM | [REDACTED] | 1859689 | | \$2.95 | Success | 2.50 | Records - People | e [REDACTED], d [REDACTED] |
| 13 | 11/5/2008 12:05:05 PM | [REDACTED] | 1858132 | | \$2.95 | Success | 2.50 | Records - People | s [REDACTED], c [REDACTED] |
| 14 | 11/4/2008 3:14:09 PM | [REDACTED] | 1856713 | | \$2.95 | Success | 2.50 | Records - People | s [REDACTED], j [REDACTED] a |
| 15 | 11/4/2008 3:10:15 PM | [REDACTED] | 1856705 | | \$2.95 | Success | 2.50 | Records - People | s [REDACTED], j [REDACTED] a |
| 16 | 11/4/2008 10:56:24 AM | [REDACTED] | 1856143 | | \$2.95 | Success | 2.50 | Records - People | b [REDACTED], m [REDACTED] s |
| 17 | 10/29/2008 3:54:56 PM | [REDACTED] | 1846361 | | \$2.95 | Success | 2.50 | Records - People | w [REDACTED], d [REDACTED] |
| 18 | 10/27/2008 2:35:39 PM | [REDACTED] | 1842766 | | \$2.95 | Success | 2.50 | Records - People | b [REDACTED], [REDACTED] |
| 19 | 10/20/2008 9:59:44 AM | [REDACTED] | 1830754 | | \$2.95 | Success | 2.50 | Records - People | k [REDACTED], t [REDACTED] |
| 20 | 9/19/2008 12:36:54 PM | [REDACTED] | 1781726 | | \$2.95 | Success | 2.50 | Records - People | n [REDACTED], m [REDACTED] a |
| 21 | 9/19/2008 12:36:28 PM | [REDACTED] | 1781724 | | \$2.95 | Failure | | Records - People | n [REDACTED], m [REDACTED] a |
| 22 | 9/4/2008 12:17:29 PM | [REDACTED] | 1769989 | | \$9.95 | Success | 2.50 | Records - People | f [REDACTED], m [REDACTED] |
| 23 | 8/25/2008 10:16:04 AM | [REDACTED] | 1764575 | | \$2.95 | Success | 2.50 | Records - People | r [REDACTED], d [REDACTED] in NJ |
| 24 | 7/29/2008 12:43:50 PM | [REDACTED] | 1745544 | | \$9.95 | Success | 2.50 | Records - People | c [REDACTED], s [REDACTED] e in NY born 1961 [REDACTED] |
| 25 | 7/28/2008 10:25:09 AM | [REDACTED] | 1744604 | | \$9.95 | Success | 2.50 | Records - People | c [REDACTED], d [REDACTED] in NY |
| 26 | 7/22/2008 3:07:14 PM | [REDACTED] | 1740371 | | \$9.95 | Success | 2.50 | Records - People | b [REDACTED], b [REDACTED] |
| 27 | 7/18/2008 4:32:07 PM | [REDACTED] | 1737158 | | \$9.95 | Success | 2.50 | Records - People | v [REDACTED], j [REDACTED] |
| 28 | 3/19/2008 10:22:48 AM | [REDACTED] | 1640112 | | \$9.95 | Success | 2.50 | Records - People | b [REDACTED], s [REDACTED] in CA |
| 29 | 1/9/2008 12:31:38 PM | [REDACTED] | 1564184 | | \$9.95 | Success | 2.50 | Records - People | s [REDACTED], d [REDACTED] |

1 - 29 of 29 records

18

REDACTED

HOANG 000115

EXHIBIT D

Walsh, Maryellen (Perkins Coie)

From: Charlotte Williams [Charlotte@newmanlaw.com]
Sent: Monday, December 10, 2012 2:46 PM
To: Locke, Ashley A. (Perkins Coie)
Cc: Roos, Breena M. (Perkins Coie); Keith Scully
Subject: Hoang v. IMDb et al

Ashley,

I want to confirm the agreements we reached during our call regarding confidential designations.

First, we will file your redacted versions of Exhibit 6 to Cairella's 30(b)(6) deposition and Exhibit 6 to Cairella's deposition (IMDb 001103-04 and Hoang 000113-119). Both of these documents relate to the PrivateEye.com searches. For the purpose of the IMDb's motion to seal, we agree that the credit card information and personal address of Cairella should be redacted, but disagree about the redaction of the individuals' names who were searched.

Second, we will not file Exhibit 7 to Cairella's deposition (IMDb 001087-90). We will rely on the deposition testimony to establish that IMDb used credit card information to find Ms. Hoang's legal name.

Please email me or give me a call if you have any questions. If you can send me the redacted versions of both Exhibit 6s to the two Cairella depositions by 3:30, we would appreciate it.

Thank you,
Charlotte

NEWMAN | DUWORS
ATTORNEYS

Charlotte Williams

206.274.2821 - Direct Phone

206.274.2801 - Fax

charlotte@newmanlaw.com

Email privileged and confidential - please destroy if you are not the intended recipient.